

Exhibit
“1”

Disclosure

GIBBS GIDEN LOCHER TURNER SENET & WITTBRODT LLP

Steven Mack, Esq.
Nevada State Bar # 4000
**GIBBS GIDEN LOCHER TURNER
SENET & WITTBRODT LLP**
1140 N. Town Center Drive, Suite 300
Las Vegas, Nevada 89144-0596
(702) 836-9800

Attorneys for Plaintiffs
DARLENE CARTER and DAVID
BLANCO

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DARLENE CARTER, an individual; and
DAVID BLANCO, an individual,

Plaintiff,

v.

LIBERTY MUTUAL INSURANCE, a foreign
entity; DOES I-X; ROE CORPORATIONS I-
X, inclusive,

Defendants.

Case No.: 2:19-cv-01779-APG-BNW

**PLAINTIFFS DARLENE CARTER
AND DAVID BLANCO'S REBUTTAL
EXPERT DISCLOSURE PURSUANT
TO FRCP 26(A)(2)**

Plaintiffs DARLENE CARTER and DAVID BLANCO ("Plaintiffs") by and through
their attorney of record, Steven Mack, Esq., of the law firm of Gibbs Giden Locher Turner
Senet & Wittbrodt LLP, hereby designates the following rebuttal expert witness pursuant to
Federal Rules of Civil Procedure 26(a)(2).

1. Lane Swainston CBO, CXLT
Swainston Consulting Group
1541 Little Dove Court
Henderson, NV 89014

Lane Swainston is a principal consultant and expert as to construction, engineering,
standards, and repairs as well as the valuation thereof, and is expected to testify regarding
those matters stated in his report, as well as any other related matters as such information is
discovered or provided to Ms. Swainston and included in any additions, updates or revisions
to the report produced herein. Mr. Swainston's rebuttal expert report, is attached hereto as
Exhibit "A."

1 Plaintiffs reserve the right to amend the foregoing list of witnesses as discovery
2 continues and reserves the right to call any witness identified by the Defendants. Plaintiff
3 also reserves the right to supplement this disclosure as allowed by the Federal Rules of Civil
4 Procedure.

5
6 DATED: July 31, 2020

GIBBS GIDEN LOCHER TURNER
SENET & WITTBRODT LLP

7
8
9 By: /s/ Steven Mack

Steven Mack, Esq.
Nevada State Bar # 4000
1140 N. Town Center Drive, Suite 300
Las Vegas, Nevada 89144
Attorneys for Plaintiffs
DARLENE CARTER and DAVID BLANCO

GIBBS GIDEN LOCHER TURNER SENET & WITTBRODT LLP

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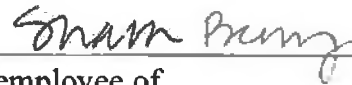
CERTIFICATE OF MAILING

The undersigned, an employee of the law firm of GIBBS GIDEN LOCHER TURNER SENET & WITTBRODT LLP, hereby certifies that on July 31, 2020, she served a copy of the foregoing **PLAINTIFFS DARLENE CARTER AND DAVID BLANCO'S REBUTTAL EXPERT DISCLOSURE PURSUANT TO FRCP 26(A)(2)** by electronic mail and by placing said copy in an envelope, postage fully prepaid, in the U.S. Mail at Las Vegas, Nevada, said envelope(s) addressed to:

Andrew C. Green, Esq.
Nathaniel T. Collins, Esq.
KOELLER, NEBEKER, CARLSON &
HALUCK
400 S. Fourth Street, Suite 600
Las Vegas, Nevada 89101

Attorneys for Defendants **LIBERTY
MUTUAL INSURANCE**

Tel: (702) 853-5500
Fax: (702) 853-5599
Email: nathaniel.collins@knchlaw.com
Email: andrew.green@knchlaw.com


An employee of
Gibbs Giden Locher Turner
Senet & Wittbrodt LLP

GIBBS GIDEN LOCHER TURNER SENET & WITTBRODT LLP

Steven Mack, Esq.
Nevada State Bar # 4000
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Attorneys for Plaintiffs
DARLENE CARTER and DAVID
BLANCO

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DARLENE CARTER, an individual; and
DAVID BLANCO, an individual,

Plaintiff,

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LIBERTY MUTUAL INSURANCE, a foreign
entity; DOES I-X; ROE CORPORATIONS I-
X, inclusive,

Defendants.

Case No.: 2:19-cv-01779-APG-BNW

**PLAINTIFFS THIRD
SUPPLEMENTAL LIST OF
WITNESSES AND PRODUCTION OF
DOCUMENTS PURSUANT TO NRCP
16.1**

Plaintiffs, DARLENE CARTER and DAVID BIANCO (hereinafter "Plaintiffs") by
and through their attorneys of record, Steven Mack, Esq. of the law firm of Gibbs Giden
Locher Turner Senet & Wittbrodt LLP, and hereby produce, or will produce where indicated,
pursuant to NRCP 16.1, the following tangible things or documents that may be introduced into
evidence; the identity of non-expert witnesses; and other mandatory NRCP 16.1 Disclosures.

I. LIST OF WITNESSES

1. DARLENE CARTER
c/o Steven Mack, Esq.
Black & LoBello
10777 W. Twain Avenue, 3rd Floor
Las Vegas, NV 89135

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GIBBS GIDEN LOCHER TURNER SENET & WITTBRODT LLP

This witness is expected to testify concerning the facts and circumstances surrounding the incident which is the subject of the Complaint on file herein and the alleged damages.

2. DAVID BIANCO
c/o Steven Mack, Esq.
Black & LoBello
10777 W. Twain Avenue, 3rd Floor
Las Vegas, NV 89135

This witness is expected to testify concerning the facts and circumstances surrounding the incident which is the subject of the Complaint on file herein and the alleged damages.

3. LANE SWAINSTON, PRINCIPAL CONSULTANT
SWAINSTON CONSULTING GROUP
c/o Steven Mack, Esq.
Black & LoBello
10777 W. Twain Avenue, 3rd Floor
Las Vegas, NV 89135

This witness is an expert witness, expected to testify to the status of the property, the repairs necessary to the property, damage done or caused to the property by the contractors work, failure to complete the work or by improper workmanship, damages caused by natural events to the extent possible, the consequential damages caused to the property as a result of the contractors failure to complete the work in a timely and proper manner, and any other matters contained in the various reports and testimony by the witness about the facts which are the subject of the Complaint on file herein as well as the expected repair costs and other related damages.

4. PERSON MOST KNOWLEDGABLE
LIBERTY MUTUAL INSURANCE
c/o Andrew C. Green, Esq.
Koeller, Nebeker, Carlson & Haluck, LLP
400 South 4th Street, Suite 600
Las Vegas, NV 89101

This witness is expected to testify concerning similar facts and circumstances surrounding similar incidents and the incident and actions taken by Liberty which are the subject of the Complaint on file herein.

GIBBS GIDEN LOCHER TURNER SENET & WITTBRODT LLP

5. JAMIE LUCIDO
INNOVATION GROUP
1051 Perimeter Drive
Suite 800
Schaumburg, IL 60173
888-840-4678

This witness is expected to testify concerning Innovation Group, their construction network, referral network and how they work with Liberty and what position they hold and ability to facilitate settlements on behalf of Liberty, and specifically as to the incidents which are the subject of the Complaint on file herein and the alleged damages.

6. BYRON JOHNSON
INNOVATION GROUP
1051 Perimeter Drive
Suite 800
Schaumburg, IL 60173
888-840-4678

This witness is expected to testify concerning similar facts and circumstances surrounding similar incidents and the incident and actions which Innovation Group took, which are the subject of the Complaint on file herein.

7. PERSON MOST KNOWLEDGABLE
DALLAS WHITE Property Restoration
6135 Harrison Drive, Suite 8
Las Vegas, NV 89120
Corp. Office: (702) 478-6988

This witness is expected to testify concerning the facts and circumstances surrounding the incident which is the subject of the Complaint on file herein and the alleged damages.

8. FRANCISCO ESQUEDA
BELFOR PROPERTY RESTORATION
2915 Coleman Street
North Las Vegas, NV 89032

This witness is expected to testify concerning the facts and circumstances surrounding the incident which is the subject of the Complaint on file herein and the alleged damages.

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9. MATT DEGELOMO, Claims Manager
Liberty Mutual Insurance
c/o Andrew C. Green, Esq.
Koeller, Nebeker, Carlson & Haluck, LLP
400 South 4th Street, Suite 600
Las Vegas, NV 89101

This witness is expected to testify concerning similar facts and circumstances surrounding similar incidents and the incident and actions taken by Liberty which are the subject of the Complaint on file herein.

10. CASEY GHOBRIAL
Liberty Mutual Insurance
c/o Andrew C. Green, Esq.
Koeller, Nebeker, Carlson & Haluck, LLP
400 South 4th Street, Suite 600
Las Vegas, NV 89101

This witness is expected to testify concerning similar facts and circumstances surrounding similar incidents and the incident and actions taken by Liberty which are the subject of the Complaint on file herein.

11. AUGUST NARDO NI, Adjuster
Liberty Mutual Insurance
c/o Andrew C. Green, Esq.
Koeller, Nebeker, Carlson & Haluck, LLP
400 South 4th Street, Suite 600
Las Vegas, NV 89101

This witness is expected to testify concerning similar facts and circumstances surrounding similar incidents and the incident and actions taken by Liberty which are the subject of the Complaint on file herein.

12. TODD ROBERTS
TLC ROOFING SERVICES
3540 W. Sahara Ave., #E6-116
Las Vegas, NV 89102
Tel: 702-688-0244 direct line
Off: 702-655-7663

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1 This witness is expected to testify concerning the facts and circumstances surrounding
2 the incident which is the subject of the Complaint on file herein and the alleged damages.

3 13. PERSON MOST KNOWLEDGEABLE
4 ECCO ELECTRIC COMPANY
5 8022 South Rainbow Blvd., Suite 166
6 Las Vegas, NV 89139

7 This witness is expected to testify concerning the facts and circumstances surrounding
8 the incident which is the subject of the Complaint on file herein and the alleged damages.

9 14. TYRA RUTLEDGE
10 GUILD MORTGAGE
11 P.O. Box 85046
12 San Diego, CA 92186-5046
13 Ph: 858-627-3622 Direct Line

14 This witness is expected to testify concerning the facts and circumstances surrounding
15 the incident which is the subject of the Complaint on file herein and the alleged damages.

16 15. WANDA CHAMBERS
17 Liberty Mutual Insurance
18 c/o Andrew C. Green, Esq.
19 Koeller, Nebeker, Carlson & Haluck, LLP
20 400 South 4th Street, Suite 600
21 Las Vegas, NV 89101

22 This witness is expected to testify concerning the facts and circumstances surrounding
23 the incident which is the subject of the Complaint on file herein and the alleged damages.

24 16. MICHAEL DIAZ
25 Liberty Mutual Insurance
26 c/o Andrew C. Green, Esq.
27 Koeller, Nebeker, Carlson & Haluck, LLP
28 400 South 4th Street, Suite 600
Las Vegas, NV 89101

29 This witness is expected to testify concerning the facts and circumstances surrounding
30 the incident which is the subject of the Complaint on file herein and the alleged damages.

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17. TYLER HOLLINGSWORTH
Liberty Mutual Insurance
c/o Andrew C. Green, Esq.
Koeller, Nebeker, Carlson & Haluck, LLP
400 South 4th Street, Suite 600
Las Vegas, NV 89101

This witness is expected to testify concerning the facts and circumstances surrounding the incident which is the subject of the Complaint on file herein and the alleged damages.

18. BILLY GOOLD
Liberty Mutual Insurance
c/o Andrew C. Green, Esq.
Koeller, Nebeker, Carlson & Haluck, LLP
400 South 4th Street, Suite 600
Las Vegas, NV 89101

This witness is expected to testify concerning the facts and circumstances surrounding the incident which is the subject of the Complaint on file herein and the alleged damages.

19. JASON MERCER
Liberty Mutual Insurance
c/o Andrew C. Green, Esq.
Koeller, Nebeker, Carlson & Haluck, LLP
400 South 4th Street, Suite 600
Las Vegas, NV 89101

This witness is expected to testify concerning the facts and circumstances surrounding the incident which is the subject of the Complaint on file herein and the alleged damages.

20. PERSON MOST KNOWLEDGEABLE FOR
INNOVATION GROUP
1051 Perimeter Drive
Schaumburg, IL 60173
(888) 840-4678

This witness is expected to testify concerning the facts and circumstances surrounding the incident which is the subject of the Complaint on file herein and the alleged damages.

21. ANDREA PETREY
INNOVATION GROUP
1051 Perimeter Drive
Schaumburg, IL 60173
(888) 840-4678

1 This witness is expected to testify concerning the facts and circumstances surrounding
2 the incident which is the subject of the Complaint on file herein and the alleged damages.

3 22. STEPHANIE FARMER
4 INNOVATION GROUP
5 1051 Perimeter Drive
6 Schaumburg, IL 60173
7 (888) 840-4678

8 This witness is expected to testify concerning the facts and circumstances surrounding
9 the incident which is the subject of the Complaint on file herein and the alleged damages.

10 23. BRITTANY BISE
11 INNOVATION GROUP
12 1051 Perimeter Drive
13 Schaumburg, IL 60173
14 (888) 840-4678

15 This witness is expected to testify concerning the facts and circumstances surrounding
16 the incident which is the subject of the Complaint on file herein and the alleged damages.

17 Plaintiffs identify and incorporate into their list of witnesses and any and all witnesses
18 needed for rebuttal and/or impeachment.

19 Discovery is continuing and Plaintiffs reserve the right to supplement with the names
20 of additional and/or percipient witnesses as they become known through the course of
21 discovery. Plaintiffs further reserve the right to call any witnesses identified by any other
22 party to this action.

23 Additionally, Plaintiffs reserve the right to identify experts at a later date.

24 **II. LIST OF DOCUMENTS**

25 Plaintiff makes the following disclosure of documents reasonably available and
26 contemplated to be used in the instant action:

27 1. Liberty Mutual First Date of Loss dated 4/30/16; bates stamped as
28 PLT000001-PLT000007; attached hereto as Exhibit 1.

2. Liberty Mutual Continued First Date of Loss dated 4/30/16; bates stamped as
PLT000008-PLT000022; attached hereto as Exhibit 2.

1 3. Liberty Mutual Communication - Claim Opened March 2017; bates stamped as
2 PLT000023; attached hereto as Exhibit 3.

3 4. Email from Stephanie Farmer Innovation Group dated 7/10/17; bates stamped
4 as PLT000024-PLT000025; attached hereto as Exhibit 4.

5 5. TCL Roof Services Proposal 7/10/17; bates stamped as PLT000026-
6 PLT000027; attached hereto as Exhibit 5.

7 6. Email for Liberty Mutual re: Damage and Loss dated 10/31/17; bates stamped
8 as PLT000028-PLT000039; attached hereto as Exhibit 6.

9 7. Liberty Mutual Letter dated 12/8/17 payment of covered damages; bates
10 stamped as PLT000040; attached hereto as Exhibit 7.

11 8. Email from Innovation Property dated May 7, 2018; bates stamped as
12 PLT000041; attached hereto as Exhibit 8.

13 9. Belfor Property Restoration Invoice dated 5/9/18; bates stamped as
14 PLT000042-PLT000057; attached hereto as Exhibit 9.

15 10. Insurance Payments 5/10/18; bates stamped as PLT000058-PLT000067;
16 attached hereto as Exhibit 10.

17 11. Email from David Bianco to Casey Gobrial dated 6/11/18; bates stamped as
18 PLT000068-PLT000069; attached thereto as Exhibit 11.

19 12. Email from Casey Gobrial Liberty Mutual Claim Opened dated 6/20/18; bates
20 stamped as PLT000070; attached hereto as Exhibit 12.

21 13. Email from Matt Degelormo to David Bianco dated 6/20/18; bates stamped as
22 PLT000071-PLT000072; attached hereto as Exhibit 13.

23 14. Email from August Nardoni re: Roofer Inspection dated 6/28/18; bates
24 stamped as PLT000073; attached hereto as Exhibit 14.

25 15. Email from August Nardoni re: Inspection dated 7/13/18; bates stamped as
26 PLT000074-PLT000075; attached hereto as Exhibit 15.

27 16. Email to M. Degelormo re: Ins. Payments 12/12/18; bates stamped as
28 PLT000076-PLT000078; attached hereto as Exhibit 16.

- 1 17. Appointment of Contractors Board – Ron Simon 1/17/19; bates stamped as
2 PLT000079-PLT000083; attached hereto as Exhibit 17.
- 3 18. Email Chain from 11/29/18 – 1/23/19 re: wind damage claim; bates stamped as
4 PLT000084-PLT000101; attached hereto as Exhibit 18.
- 5 19. Email Chain M. Degelormo re: Loss 1/31/19; bates stamped as PLT000102-
6 PLT000123; attached hereto as Exhibit 19.
- 7 20. Email re: Pictures and Conditions of Damages 03/04/19; bates stamped as
8 PLT000124-PLT000132; attached hereto as Exhibit 20.
- 9 21. NV Division of Insurance Complaint 3/14/19; bates stamped as PLT000133-
10 PLT000135; attached hereto as Exhibit 21.
- 11 22. NV Division of Insurance Response to Complaint 4/18/19; bates stamped as
12 PLT000136-PLT000168; attached hereto as Exhibit 22.
- 13 23. Belfor Restoration Demand for Payment dated 4/18/19; bates stamped as
14 PLT000169-PLT000175; attached hereto as Exhibit 23.
- 15 24. Black & Lobello Response Letter to Belfor Demand dated 4/18/19; bates
16 stamped as PLT000176-PLT000177; attached hereto as Exhibit 24.
- 17 25. Black & Lobello Response to 4/18/19 Response from Ins. Division 4/23/19;
18 bates stamped as PLT000178-PLT000181; attached hereto as Exhibit 25.
- 19 26. NV State Contractors Board re: Belfor Complaint 4/25/19; bates stamped as
20 PLT000182-PLT000184; attached hereto as Exhibit 26.
- 21 27. Communication with Liberty Mutual; bates stamped as PLT000185-
22 PLT000189; attached hereto as Exhibit 27.
- 23 28. DallasWhite – Payments; bates stamped as PLT000190-PLT000202; attached
24 hereto as Exhibit 28.
- 25 29. Photos – Construction; bates stamped as PLT000203-PLT000217; attached
26 hereto as Exhibit 29.
- 27 30. Photos – Interior Water Damage; bates stamped as PLT000218-PLT000327;
28 attached hereto as Exhibit 30.

1 31. Photos – Personal Items Damaged; bates stamped as PLT000328-PLT000349;
2 attached hereto as Exhibit 31.

3 32. Photos – Roof & Exterior Damage; bates stamped as PLT000350-PLT000499;
4 attached hereto as Exhibit 32.

5 33. Purchases for Replacement; bates stamped as PLT000500-PLT000526;
6 attached hereto as Exhibit 33.

7 34. Swainston Report dated 9/13/19; bates stamped as PLT000527-PLT000529;
8 attached hereto as Exhibit 34.

9 35. Swainston Drone Photos; bates stamped as PLT000530; attached hereto as
10 Exhibit 35.

11 36. Swainston Drone Videos; bates stamped as PLT000531; attached hereto as
12 Exhibit 36.

13 37. Swainston Sony Photos; bates stamped as PLT000532; attached hereto as
14 Exhibit 37.

15 38. IPN Contractor Workmanship Warranty; bates stamped as PLT000533-
16 PLT000534; attached hereto as Exhibit 38.

17 39. Liberty Mutual Ins. – Policy Period 2016-2017; bates stamped as PLT000535-
18 PLT000553; attached hereto as Exhibit 39.

19 40. Liberty Mutual Ins. – Policy Period 2017-2018; bates stamped as PLT000554-
20 PLT000561; attached hereto as Exhibit 40.

21 41. Liberty Mutual Ins. – Policy Period 2018-2019; bates stamped as PLT000562-
22 PLT000570; attached hereto as Exhibit 41.

23 42. Guild Mortgage Statement – 04/29/2016; bates stamped as PLT000571-
24 PLT000574; attached hereto as Exhibit 42.

25 43. Guild Mortgage Statement – 01/16/2020; bates stamped as PLT000575-
26 PLT000578; attached hereto as Exhibit 43.

27 44. Various Documents; bates stamped as PLT000579-PLT000756; attached
28 hereto as Exhibit 44.

1 45. Swainston Consulting Group Current Rate Sheet; bates stamped as
2 PLT000757; attached hereto as Exhibit 45.

3 46. Estimate; bates stamped as PLT000758; attached hereto as Exhibit 46.

4 47. Lane Swainston List of Testimony; bates stamped as PLT000759-PLT000767;
5 attached hereto as Exhibit 47.

6 48. Lane Swainston CV; bates stamped as PLT000768-PLT000772; attached
7 hereto as Exhibit 48.

8 49. Liberty Mutual and Innovation Property; bates stamped as PLT000773-
9 PLT000774; attached hereto as Exhibit 49.

10 50. Swainston Consulting Group Supplemental Report; bates stamped as
11 PLT000775-PLT000790; attached hereto as Exhibit 50.

12 51. SKM; bates stamped as PLT000791-PLT000792; attached hereto as Exhibit
13 51.

14 52. Mold Inspection Report; bates stamped as PLT000793-PLT000819;
15 attached hereto as Exhibit 52.

16 53. Lab Results; bates stamped as PLT000820-PLT000832; attached hereto as
17 Exhibit 53.

18 54. JoAnna Moore Supplemental Expert Report; bates stamped as
19 PLT000833-PLT000839; attached hereto as Exhibit 54.

20 **III. RESERVATION OF RIGHTS**

21 Plaintiff reserves the right to amend or supplement these disclosures by Fed. R. Civ.
22 P. 26(e) and to object to the admissibility of any document or statement in these disclosures
23 or in Defendants' initial disclosures on all bases pursuant to the Federal Rules of Civil
24 Procedure, Federal Rules of Evidence, Local Rules, and governing law.

25 **IV. CALCULATION OF ANTICIPATED DAMAGES**

26 Plaintiffs Computation of their estimated damages is based upon the calculations and
27 testimony made by the Plaintiffs Expert Lane Swainston and is currently \$232,449.80. The
28 exact calculation of the damages is more detailed in document PLT000758. The calculations

1 include repairs to the home of the Plaintiffs and are calculated and broken out as follow:
 2 Roof repair \$25,000, Carpentry \$7,000, Paint and Drywall (interior) \$34,000, Paint (exterior)
 3 \$4,000, Asbestos and Mold abatement \$36,000, Interior trim and doors \$18,000, windows
 4 \$9,000, barbeque \$4,000, contents damages \$12,000, general conditions and overhead/profit
 5 \$53,618 and contingency of 10% \$21,131.

6 In addition to these special damages as calculated above, Plaintiffs are entitled to
 7 punitive damages for the bad faith insurance claim and breach of the covenant of good faith
 8 and fair dealing from the Defendant in dealing with the Plaintiffs claims and treatment
 9 thereof.

10 **V. CERTIFICATION**

11 The undersigned certifies that to the best of his knowledge, information and belief,
 12 which has been formed after reasonable inquiry under the circumstances, this disclosure is
 13 complete and correct at the time it was being made.

14
 15 DATED: January 25, 2021

GIBBS GIDEN LOCHER TURNER
 SENET & WITTBRODT LLP

16
 17
 18 By: 

19 Steven Mack, Esq.
 20 Nevada State Bar # 4000
 21 1140 N. Town Center Drive, Suite 300
 22 Las Vegas, Nevada 89144
 23 Attorneys for Plaintiffs
 24 DARLENE CARTER and DAVID BLANCO
 25
 26
 27
 28

GIBBS GIDEN LOCHER TURNER SENET & WITTBRODT LLP

CERTIFICATE OF MAILING

The undersigned, an employee of the law firm of GIBBS GIDEN LOCHER TURNER SENET & WITTBRODT LLP, hereby certifies that on January 25, 2021, she served a copy of the foregoing **PLAINTIFFS THIRD SUPPLEMENTAL LIST OF WITNESSES AND PRODUCTION OF DOCUMENTS PURSUANT TO NRCP 16.1** by e-mail and by placing said copy in an envelope, postage fully prepaid, in the U.S. Mail at Las Vegas, Nevada, said envelope(s) addressed to:

Andrew C. Green, Esq.
Nathaniel T. Collins, Esq.
KOELLER, NEBEKER, CARLSON &
HALUCK
400 S. Fourth Street, Suite 600
Las Vegas, Nevada 89101

Attorneys for Defendants **LIBERTY
MUTUAL INSURANCE**

Tel: (702) 853-5500
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Email: nathaniel.collins@knchlaw.com
Email: andrew.green@knchlaw.com



An employee of
Gibbs Giden Locher Turner
Senet & Wittbrodt LLP